

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED

AUG 29 2019

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WILLIAM GOODLOW,  
aka "Good";

Defendant.

4:19CR718 RWS/JMB

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Angie E. Danis, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds for detention, the government requests this Court to consider the following factors pursuant to Title 18, United States Code, Section 3142(g)(1), (2), and (3):

**Presumption of Detention**

1. The defendant is charged in Count 1 with offenses for which a maximum term of imprisonment of 20 years is prescribed in the Controlled Substances Act Title 21, United States Code, Section 801, et seq.), conspiracy to distribute controlled substances.

2. Accordingly, a rebuttable presumption arises, pursuant to Title 18, United States Code, Section 3142(e)(3), that there are no conditions or combination of conditions which will reasonably assure the safety of any other person and the community.

**The Nature and Circumstances of the Offense**

3. The defendant is charged in Count I of the Indictment with Conspiracy to Distribute both heroin and fentanyl.

4. As part of the conspiracy, William Goodlow acted as a source of narcotics supply to both Christopher Moore and Jeffrey Stidmon.

**The Weight of the Evidence Against the Defendant**

5. The defendant was identified through physical surveillance, wiretap communications, and enforcement actions as supplying narcotics to members of the conspiracy.

6. While on federal supervised release for another conspiracy in which he was distributing heroin and fentanyl, Goodlow was being supervised out of Texas, indicating that he has significant out-of-state ties and, therefore, presents a risk of flight.

**The History and Characteristics of the Defendant and  
the Nature and Seriousness of the Danger to the Community**

7. The defendant's criminal history, to include a federal prior from the Eastern District of Missouri for a heroin and fentanyl conspiracy, indicates that he is not amenable to supervision.

WHEREFORE, the government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN  
UNITED STATES ATTORNEY

/s/ Angie E. Danis

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